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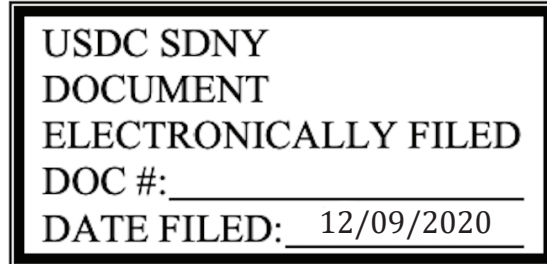
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November 16, 2020

By Email

Hon. Victor Marrero
United States District Court
Southern District of New York
500 Pearl Street, Suite 1610
New York, NY 10007-1312



Re: United States v. Rubin Rameriz,
19 Cr 579(VM)

Your Honor,

Mr. Rameriz was timely released from jail under the Court's previous Order and has been in full compliance with all of the release protocols. I am writing the Court to respectfully request with the consent of the Government for the Court to amend the release order issued under Order 72. In Order 72 the Court makes clear that Mr. Rameriz is to seek employment however it does not outline the parameters of the employment situation allowed. Mr. Rameriz has indeed sought and found employment however, being that Mr. Rameriz profession is as a diesel engine repairman his employment necessitates that he move about during the day to different locations where the actual trucks that need repair are located. Thus, there is no one location that he will be assigned to for employment. Thus, Pre-Trial Services has requested that this Court specifically allow Mr. Rameriz to be employed under these conditions.

Therefore, again with the Government's consent it is most respectfully requested that the Court amend the release order to include the following conditions:

- 1- Mr. Rameriz is allowed to leave his house for purposes of employment each day at 6:00am and return to his home by 6:30PM.
- 2- Mr. Rameriz is to give his Pre-Trial Services Officer updates as to his location of employment each day as soon as he knows where he is to report to.

Honorable Victor Marrero

December 8, 2020

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It is very important for Mr. Rameriz to work so that his wife, Claudia can stop working and take care of her health issues full time. Without Mr. Rameriz being able to work his wife, Claudia must keep working which makes it hard for her to take care of herself. As admitted by all Mr. Rameriz is not a flight risk. He just wants to work and support his family and make sure his wife can get the medical care she so desperately needs.

Thank you very much for your prompt attention to this matter.

Most Respectfully,


David Touger, Esq.

